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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DWIGHT BOUSE,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:24-cv-00687-APG-DJA

**Stipulation and Order to Extend
Discovery Deadlines**

(Fourth Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This stipulation is filed at least 21 days before the earliest deadline to be extended (expert disclosures). The current deadline for expert disclosures is June 13, 2025. The parties have conducted discovery diligently and in good faith. This is the fourth request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Plaintiff made his initial disclosures on August 27, 2024.
2. Defendant made its initial disclosures on August 30, 2024.
3. Plaintiff served a Request for Production on Defendant on October 15, 2024.

1 4. Defendant served its first supplemental disclosure of witnesses and documents
2 on October 23, 2024.

3 5. Defendant served its First Set of Interrogatories and Requests for Production
4 on Plaintiff on November 5, 2024.

5 6. Defendant served its second supplemental disclosure of witnesses and
6 documents and responses to Plaintiff's Request for Production on November 14, 2024.

7 7. Plaintiff served his responses to Defendant's First Set of Interrogatories and
8 Requests for Production on December 12, 2024.

9 8. Defendant noticed the depositions of Plaintiff and his wife for February 20,
10 2025.

11 9. Plaintiff served his first supplemental disclosure of witnesses and documents
12 on January 29, 2025.

13 10. Plaintiff served his second supplemental disclosure of witnesses and
14 documents on January 30, 2025.

15 11. Defendant took the depositions of Plaintiff and his wife on February 20, 2025.

16 12. Defendant served its third supplemental disclosure of witnesses and
17 documents on March 20, 2025.

18 13. Plaintiff provided the requested additional HIPAA authorizations on March
19 27, 2025, and Defendant subpoenaed Plaintiff's medical records on April 15, 2025.

20 14. Defendant served its fourth supplemental disclosure of witnesses and
21 documents on April 4, 2025.

22 15. Defendant took the depositions of VA providers Nurse Lili Picar and Dr.
23 Muuz Desta on April 22, 2025.

24 16. Defendant received a response from MRO, the medial records processing
25 company for UMC, for issues with the provided signed HIPAA. On April 23, 2025
26 Defendant requested a signed HIPAA from Plaintiff per the sample provided by MRO.

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DISCOVERY REMAINING

Defendant is expecting to receive Plaintiff's additional medical records from his medical providers, the parties will need to take the depositions of Plaintiff's medical providers, designate initial and rebuttal experts, and depose expert witnesses.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Since the Order granting the Stipulation to Continue to Discovery (ECF No. 21), the parties have been working diligently to advance discovery. Currently, the parties are comparing and coordinating schedules to depose Plaintiff's treating physicians, Dr. Andrew Park, Dr. Mary Lock, Dr. Cleofemarie Vergara, Nurse Gianni Sanchez, Dr. Jason Dazley and Dr. Todd Christensen.

The requested extension will allow the parties to schedule and take Plaintiff's medical providers' depositions, obtain Plaintiff's medical records from his disclosed additional providers, provide the deposition transcripts and medical records to their experts, disclose expert reports and take experts depositions.

The parties' counsel conferred and agreed that a sixty (60) day extension would be proper. The parties agree that neither party will be prejudiced by the proposed extension, and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

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EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Expert Disclosure	June 13, 2025	August 13, 2025
Rebuttal Expert Disclosure	July 14, 2025	September 12, 2025
Discovery Cutoff	August 12, 2025	October 13, 2025
Dispositive Motions	September 12, 2025	November 11, 2025
Proposed Joint Pretrial Order	October 13, 2025	December 12, 2025¹

This request for an extension of time is not sought for any improper purpose including delay. This is the fourth request for an extension of discovery deadlines in this matter.

Respectfully submitted this 29th day of April 2025.

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IT IS SO ORDERED:


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: April 30, 2025

¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.